

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

BETHEL MINISTRIES, INC.,)	
)	
)	
<i>Plaintiff,</i>)	
)	Case No. 1:19-cv-01853-SAG
DR. KAREN B. SALMON, et al.,)	
)	
)	
<i>Defendants.</i>)	
)	

**JOINT CONSENT MOTION TO DEFER DEADLINES TO OBTAIN APPROVAL
OF SETTLEMENT**

The parties move pursuant to Fed. R. Civ. P. 6 for an extension of time to file Plaintiff's Petition for Attorneys' Fees, Costs, and Expenses and Defendants' response to Plaintiff's Petition.

1. The parties have reached agreement on a settlement of Plaintiffs' claims for attorneys' fees, costs, and expenses, subject to approval of the Maryland Board of Public Works.

2. It will be several weeks before the agreement can be presented to the Board of Public Works.

3. Plaintiff's Petition is currently due on February 25, 2022 and Defendants' response is due March 28, 2022. The parties now jointly ask this Court to defer each of these deadlines by 60 days, to April 26, 2022 and May 27, 2022, respectively.

4. This will allow the parties to execute a final settlement agreement on Plaintiffs' claims for attorneys' fees, costs, and expenses and present the agreement to the Board of Public Works for approval.

5. The parties request this deferral out of respect for judicial time and resources, and in light of the high probability of a non-judicial resolution of the fee issue. It will allow the parties to finalize their settlement and resolve the attorneys' fees, costs, and expenses issue without incurring additional costs.

CONCLUSION

WHEREFORE, for the reasons stated herein, the parties ask the Court to defer their motion to suspend the deadlines for Plaintiff to file a Petition for Attorneys' Fees, Costs, and Expenses pending potential appeal, and the deadline for Defendants to file a response accordingly.

Respectfully submitted this 24th day of February, 2022.

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CERTIFICATE OF SERVICE

I certify that on this 24th day of February, 2022, the foregoing was served by CM/ECF on all registered CMF users.

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